

1 Susan S.Q. Kalra (CA State Bar No. 16740)
2 Email: skalra@rameyfirm.com
RAMEY LLP
3 5020 Montrose Blvd., Suite 800
Houston, TX 77006
4 Telephone: (800) 993-7499
5 Fax: (832) 900-4941

6 William P. Ramey, III (Admitted pro hac vice)
Email: wramey@rameyfirm.com
7 RAMEY LLP
5020 Montrose Blvd., Suite 800
8 Houston, TX 77006
9 Telephone: (713) 426-3923
Fax: (832) 689-9175

10 *Attorneys for Plaintiff*
11 **LAURI VALJAKKA**

12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND DIVISION**

15 **LAURI VALJAKKA,**

16 Plaintiff,

17 v.

18 **NETFLIX, INC.,**

19 Defendant.
20
21
22
23
24
25
26
27
28

Case No. 3:22-cv-01490-JST

**PLAINTIFF'S FILING IN RESPONSE
TO ORDER GRANTING
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (ECF 160)**

Judge: Hon. Jon S. Tigar
Crtrm: 6 – 2nd Floor

Pursuant to this Court's September 11, 2023 Order Granting Administrative Motion to Consider Whether Another Party's Material Should Be Sealed (ECF 160) Plaintiff Lauri Valjakka ("Valjakka") hereby files the following redacted and public copies of the documents set forth below:

Exhibit	Document	Portions to be Considered to be Sealed	Designating Party	Court's Ruling
A	Exhibit A ¹ (Licensing Agreement on Exclusive Right to a Patent between Lauri Valjakka and CDN Licensing for US Patent No. 8,495,167)	Document until Appendix A	Plaintiff Lauri Valjakka designated this document as "Highly Confidential Attorneys' Eyes Only"	Granted as to Document until Appendix A. Appendix A containing public patent will not be sealed.
B	Exhibit B (Excerpts from the June 2, 2023 deposition of Lauri Valjakka)	Highlighted portions containing party names to settlement and licensing agreements and any confidential terms	Plaintiff Lauri Valjakka designated the highlighted portions of this document "Highly Confidential Attorneys' Eyes Only"	GRANTED
C	Exhibit C (Confidential Final Settlement Agreement and Release)	Entire document	Plaintiff Lauri Valjakka designated this document as "Highly Confidential Attorneys' Eyes Only"	GRANTED
D	Exhibit D (Licensing Agreement on Exclusive Right to a Patent between Lauri Valjakka and CDN Licensing for	Document until Appendix A	Plaintiff Lauri Valjakka designated this document as "Highly Confidential	Granted as to Document until Appendix A. Appendix A containing public patent

¹ Exhibits in this column refer to the Exhibits attached to the Declaration of Karan Singh Dhadialla in Support of Defendant Netflix, Inc.'s Administrative Motion to Consider Whether Another Party's Material Should Be Sealed (ECF 126-1).

Exhibit	Document	Portions to be Considered to be Sealed	Designating Party	Court's Ruling
	US Patent No. 10,726,102)		Attorneys' Eyes Only	will not be sealed.
E	Exhibit E (Patent License and License Option Agreement)	Entire document	Plaintiff Lauri Valjakka designated this document as "Highly Confidential Attorneys' Eyes Only"	GRANTED
F	Exhibit F (Settlement and License Agreement)	Entire Document	Plaintiff Lauri Valjakka designated this document as "Highly Confidential Attorneys' Eyes Only"	GRANTED
G	G (Settlement Agreement)	Entire Document	Plaintiff Lauri Valjakka designated this document as "Highly Confidential Attorneys' Eyes Only"	GRANTED
H	Exhibit H (Settlement and Patent License Agreement)	Entire Document	Plaintiff Lauri Valjakka designated this document as "Highly Confidential Attorneys' Eyes Only"	GRANTED
I	Exhibit I (Excerpts from Plaintiff Lauri Valjakka's Second Supplemental Responses and Objections to Defendant Netflix's First Set of Interrogatories (No. 1-20))	Highlighted portions containing party names to settlement and licensing agreements and any confidential terms	Plaintiff Lauri Valjakka designated the highlighted portions of this document as "Confidential" or "Highly Confidential Attorneys' Eyes Only"	GRANTED

Exhibit	Document	Portions to be Considered to be Sealed	Designating Party	Court's Ruling
J	Netflix's Motion for Preliminary Injunction	Highlighted portions containing party names to settlement and licensing agreements and any confidential terms	Plaintiff Lauri Valjakka designated the highlighted portions of this document "Highly Confidential Attorneys' Eyes Only"	GRANTED

Dated: September 18, 2023

Respectfully submitted,

RAMEY LLP

By: /s/ Susan S.Q. Kalra

Susan S. Q. Kalra CA SBN 167940

5020 Montrose Blvd., Suite 800

Houston, TX 77006

Telephone: (800) 993-7499

Fax: (832) 900-4941

Email: skalra@rameyfirm.com

RAMEY LLP

By: /s/ William P. Ramey, III

William P. Ramey III (Admitted *pro hac vice*)

5020 Montrose Blvd., Suite 800

Houston, Texas 77006

Telephone: (713) 426-3923

Fax: (832) 689-9175

Email: wramey@rameyfirm.com

Attorneys for Plaintiff
LAURI VALJAKKA